

**New Hampshire Department of Environmental Services**  
**RESPONSE TO PUBLIC COMMENT**  
**AND**  
**SUMMARY OF SUBSTANTIVE DIFFERENCES MADE TO THE DRAFT 2008**  
**SECTION 303(D) LIST.**  
**September 9, 2008**

On February 23, 2008 the New Hampshire Department of Environmental Services (DES) released the draft Section 303(d) List of impaired waters for public comment. Downloadable copies of the draft list were made available on the DES website for review ([www.des.state.nh.us/wmb/swqa/](http://www.des.state.nh.us/wmb/swqa/)). In addition, the following organizations/agencies were notified by email:

Appalachian Mountain Club  
Audubon Society  
Connecticut River Joint Commissions  
Conservation Law Foundation  
County Conservation Districts  
Designated River Local Advisory Committees  
Lake and River Local Management Advisory Committees  
Maine Department of Environmental Protection  
Manchester Conservation Commission  
Massachusetts Department of Environmental Protection  
Merrimack River Watershed Council  
National Park Service  
New England Interstate Water Pollution Control Commission  
NH Department of Health and Human Services  
NH Coastal Program  
NH Rivers Council  
North Country Council  
Regional Planning Commissions  
Society for the Protection of National Forests  
Natural Resources Conservation Service  
The Nature Conservancy  
US Environmental Protection Agency  
US Geological Survey  
US Fish and Wildlife Service  
US Forest Service  
University of New Hampshire  
Vermont Department of Environmental Conservation  
Volunteer Lakes Assessment Program  
Volunteer Rivers Assessment Program  
Water Quality Standards Advisory Committee

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The public comment period ended on March 23, 2006. The following represents DES's response to public comments received during this period and a summary of substantive differences between the February 23<sup>rd</sup> draft and September 9 2008 Section 303(d) List. Comments have been paraphrased in some cases. Comments in their entirety are provided at <http://des.nh.gov/WMB/swqa/>

## **A. RESPONSE TO PUBLIC COMMENT**

### **COMMENT # 1:**

*From:* Donna Hanscom  
Assistant Public Works Director/Laboratory Manager  
City of Keene, New Hampshire

“...[We] request that this information be considered during the comment period of the 303D list to remove AU NHRIV802010301-11 from the impaired list. This spreadsheet contains support for the attainment of the above referenced river section for dissolved oxygen. Specifically, it shows that in the summer of 2007, during a river flow comparable to the river flow at the time of DES's non-attainment data collection, the DO met dissolved oxygen water quality criteria. It also demonstrates a lower total phosphorus concentration in the river. The cause of the lower phosphorus concentration is presumably the lower concentration of phosphorus discharged by the Keene WWTP -- data on file with DES and EPA as part of the DMR reporting process and NPDES permitting process.

This data is directly relevant to reversing the non-attainment label for this river section, especially as it is described as category 5-M -- marginal impairment as described in the CALM.

Associated QC is included. The data was collected using Hydrolab equipment by Eric Swope, Industrial Pretreatment Coordinator for the City of Keene.”

### **DES RESPONSE #1:**

*Decision:* Dissolved Oxygen Saturation - NO CHANGE

*Reason:*

The Keene WWTF discharges to the lower portion of this Assessment Unit. NPDES permit limits are based on the WWTF design flow and 7Q10 river flow conditions. The Keene WWTF has a low dilution at 7Q10 conditions of approximately 2. In August 2007 it was discharging about 58% (3.5 mgd / 6 mgd) of its design flow.

Since 2001, there have been 8 violations of the 75% daily average dissolved oxygen (DO) criteria in this assessment unit at 3 sampling stations. Seven occurred in August 2001 as part of the sampling conducting by DES. Of the 7, 3 occurred at station 16B-ASH which is about 800 feet downstream of the Keene WWTF but upstream of the S Br Ashuelot River confluence (74.9% on 8/16/01, 70.4% on 8/23/01, and 72.8% on 8/29/01), 1 occurred at station 16D-ASH which is about 50 feet upstream of the Keene WWTF (71.8% on 8/23/01) and 3 occurred at station 16M-ASH which is about 1 mile upstream of the Keene WWTF and Ash Brook confluence (74.2% on 8/16/01, 68.5% on 8/23/01 and 68.2% on 8/29/01). In 2007, 1 violation occurred at station 16B-ASH (72.4% on 7/1/07).

In 2007 sampling was also conducted by representatives of the Keene WWTF at station 16D, which is about 50 feet upstream of the Keene WWTF and 16C-ASH, which is approximately 150 feet downstream from the outfall. Dataloggers were deployed at these stations for about 22 hours from the afternoon of 8/30/07 to the afternoon of 8/31/07. River flow was about 1.5 times the 7Q10 flow and water temperatures were around 21 to 23 degrees C. Results

showed an average DO of 82.8% upstream and 81.7% downstream. A copy of the data provided by Keene is included as an attached item.

Although the data collected by Keene did not indicate impairment, the 7 other violations at this and other stations do not warrant removal of DO percent saturation as an impairment in this assessment unit, especially in light of the low percent DO that has been recorded upstream of the WWTF, the other percent DO violations at 16B-ASH, and the low dilution factor associated with the WWTF. To remove an impairment, it is necessary to collect data indicating standards are met at the same locations and conditions of the original listing dataset. This was not done. The Keene sampling station (16C-ASH) is approximately 150 feet downstream of the outfall as compared to station 16B-ASH which is approximately 800 feet downstream of the outfall and where 3 of the 7 DO violations have been recorded in the past. Sampling so close to the outfall raises doubt that the effluent is completely mixed with the river and is representative of the lowest point in the traditional DO sag curve. This is further supported by the previously recorded DO violations further downstream at station 16B-ASH including one sample in the summer of 2007.

## **COMMENT # 2:**

*From:* Tom Irwin  
Senior Attorney  
Conservation Law Foundation

III(a). Significant eelgrass declines in the Piscataqua River and Little Bay demonstrate that these waters are impaired (or threatened). CLF contends that the loss of eelgrass constitutes a violation of Env-Wq 1703.19 (Biological and Aquatic Community Integrity) and that the major cause of impairment should be identified as excessive nitrogen loading and that as such, these assessment units should also be listed as impaired for Env-Wq 1703.14 (narrative nutrient criteria). CLF further requests that because of potential light attenuation impacts, DES should also consider identifying suspended solids as an additional potential cause.

## **DES RESPONSE #2:**

*Decision:* Biological Integrity (Bioassessments) (i.e. Eelgrass decline)– ACCEPT  
Nitrogen – NO CHANGE  
Suspended Solids - NO CHANGE

### *Reason:*

There has been significant loss of eelgrass cover in several sections of the Piscataqua River and Little Bay. Due to the importance of eelgrass for the ecosystem of the estuary, the loss of this habitat constitutes a water quality impairment under Env-Wq 1703.19 (Biological and Aquatic Community Integrity). The specific areas and assessment units that will be considered impaired for significant eelgrass loss as well as the methodology used to assess those areas is described in “Methodology and Assessment Results related to Eelgrass in the Great Bay Estuary for Compliance with Water Quality Standards for the New Hampshire 2008 Section 303(d) List “ by DES, August 11, 2008, WD Doc R-WD-08-18. This document underwent a two step peer review to validate the science and data used in the methodology. Details of the peer review process including DES’ response to peer review comments are provided in the methodology.

Violations of the narrative standard for nutrients, Env-Wq 1703.14, were not evident in the Piscataqua River and Little Bay. In these assessment units, there were no impairments for chlorophyll-a. The specific areas and assessment units covered by the comments as well as the

methodology used to assess those areas is described in “Methodology and Assessment Results related to Eelgrass in the Piscataqua River and Little Bay for Compliance with Water Quality Standards for the New Hampshire 2008 Section 303(d) List.”

DES does not have water quality criteria for suspended solids. Therefore, an impairment assessment for this parameter could not be completed.

**COMMENT # 3:**

*From:* Tom Irwin  
Senior Attorney  
Conservation Law Foundation

III(b). Eelgrass declines within Great Bay, particularly in light of system-wide eelgrass declines and nitrogen loading trends, demonstrate that Great Bay is an impaired (or threatened) water body. CLF contends that the loss of eelgrass constitutes a violation of Env-Wq 1703.19 (Biological and Aquatic Community Integrity) and that the major cause of impairment should be identified as excessive nitrogen loading and that as such, these assessment units should also be listed as impaired for Env-Wq 1703.14 (narrative nutrient criteria). CLF further requests that because of potential light attenuation impacts, DES should also consider identifying suspended solids as an additional potential cause.

**DES RESPONSE #3:**

*Decision:* Biological Integrity (Bioassessments) (i.e. Eelgrass decline) – ACCEPT -  
THREATENED  
Nitrogen – NO CHANGE  
Suspended Solids - NO CHANGE

*Reason:*

The historic maps of eelgrass in the Great Bay show 263.9 acres of habitat in 1948 and 1217.4 acres in 1980-1981. Median eelgrass cover for the 2003-2005 period was 2,043.3 acres. Therefore, the eelgrass cover in this area has expanded relative to the historic data sources; the change relative to the pre-colonial distribution of eelgrass is unknown. Linear regression of eelgrass cover from 1990 to 2005 did not detect a significant trend at the 0.05 significance level. The trend was evaluated for the 1990-2005 period because the eelgrass populations in the whole estuary were devastated in 1988-1989 due to an infestation of the slime mold, *Labryinthula zostera*, commonly called “wasting disease”. Therefore, per the assessment methodology, Great Bay should not be considered impaired for significant eelgrass loss.

The Clean Water Act allows for water bodies to be listed as "threatened," which generally means that the listing agency has cause to believe that the water body may well be impaired by the next listing cycle. Preliminary data for eelgrass in 2006 and 2007 in this assessment zone indicate a downward trend since 2005. This trend may be sufficient to result in significant eelgrass loss for the 2010 303(d) List. Therefore, the Great Bay should be listed as “threatened” on the 2008 303(d) List. An additional reason to consider the eelgrass habitat in the Great Bay to be threatened is the absence of eelgrass from the tributaries which served as refuges during past wasting disease outbreaks.

Available chlorophyll-a data indicate compliance with the chlorophyll-a criterion in this zone. Since there are no chlorophyll-a impairments in this zone, an impairment for nutrients per Env Wq 1703.14 is not justified.

The specific areas and assessment units covered by the comments as well as the methodology used to assess those areas is described in “Methodology and Assessment Results related to Eelgrass in the Piscataqua River and Little Bay for Compliance with Water Quality Standards for the New Hampshire 2008 Section 303(d) List.”

DES does not have water quality criteria for suspended solids. Therefore, an impairment assessment for this parameter could not be completed.

**COMMENT # 4:**

*From:* Tom Irwin  
Senior Attorney  
Conservation Law Foundation

III(c). Eelgrass declines within the Squamscott, Lamprey, and Oyster Rivers, particularly in light of system-wide eelgrass declines and nitrogen loading trends, demonstrate that these waters are impaired (or threatened). CLF contends that the loss of eelgrass constitutes a violation of Env-Wq 1703.19 (Biological and Aquatic Community Integrity) and that the major cause of impairment should be identified as excessive nitrogen loading and that as such, these assessment units should also be listed as impaired for Env-Wq 1703.14 (narrative nutrient criteria). CLF further requests that because of potential light attenuation impacts, DES should also consider identifying suspended solids as an additional potential cause.

**DES RESPONSE #4:**

*Decision:* Biological Integrity (Bioassessments) (i.e. Eelgrass decline) – ACCEPT  
Nitrogen – ACCEPT  
Suspended Solids - NO CHANGE

*Reason:*

There has been significant loss of eelgrass cover in several sections of the Squamscott, Lamprey, and Oyster Rivers. Due to the importance of eelgrass for the ecosystem of the estuary, the loss of this habitat constitutes a water quality impairment under Env-Wq 1703.19 (Biological and Aquatic Community Integrity). The specific areas and assessment units that will be considered impaired for significant eelgrass loss as well as the methodology used to assess those areas is described in “Methodology and Assessment Results related to Eelgrass in the Great Bay Estuary for Compliance with Water Quality Standards for the New Hampshire 2008 Section 303(d) List.”

Violations of the narrative standard for nutrients, Env-Wq 1703.14, were evident in the Squamscott, Lamprey, and Oyster Rivers. In these assessment units, there were impairments for chlorophyll-a. These impairments are related to excessive nitrogen. The weight-of-evidence is clear that excessive nitrogen is contributing to the impairments for chlorophyll-a in these three water bodies. The specific areas and assessment units covered by the comments as well as the methodology used to assess those areas is described in “Methodology and Assessment Results related to Eelgrass in the Piscataqua River and Little Bay for Compliance with Water Quality Standards for the New Hampshire 2008 Section 303(d) List.”

DES does not have water quality criteria for suspended solids. Therefore, an impairment assessment for this parameter could not be completed.

**COMMENT # 5:**

*From:* Tom Irwin  
Senior Attorney  
Conservation Law Foundation

IV. Readily available data and information pertaining to chlorophyll-a and dissolved oxygen demonstrate that certain water bodies (i.e., the Lower Piscataqua River, the Lamprey River, and the Winnicut River) with the Great Bay Estuary are impaired.

**DES RESPONSE #5:**

*Decision:* Lower Piscataqua River -NO CHANGE  
Lamprey River – ACCEPT  
Winnicut River – NO CHANGE

*Reason:*

***Lower Piscataqua River – Dissolved Oxygen***

CLF's comments cite "Probabilistic Assessments of Estuarine Waters for the 2006 305(b) Report" (Appendix 22 of the 2006, 305(b) Report) and states "...probabilistic assessments of New Hampshire estuarine waters resulted in findings that dissolved oxygen violations occurred in the lower Piscataqua River..."

Reviewing stations with low dissolved oxygen (mg/L) readings used in the Probabilistic Assessment memo revealed station NH00-0037C which lies in the Lower Piscataqua River (NHEST600031001-02).

One dissolved oxygen (4.6 mg/L) data point is available for NH00-0037C collected on September 9, 2000. While below the class B criteria of 5 mg/L, DES does not make a Not Supporting assessment based upon a single sample, particularly when the concentration is so close to the criteria (2008 CALM). Since the time of that one sample, 101 dissolved oxygen samples have been collected in the Lower Piscataqua River of which 62 were collected in the critical period. No exceedences of the class B criteria were recorded from January 1, 2002 to January 23, 2008 and the minimum in the critical period within that time range was 6.2 mg/L.

	Critical Period (June 1-Sept 30)	Non-Critical Period (Oct 1– May 31)	All Periods
Number of Samples	62	39	101
Median	7.9	8.6	8.0
Average	7.9	8.9	8.3
Minimum	6.4	7.1	6.4
Maximum	9.7	12.0	12.0

The "Probabilistic Assessments of Estuarine Waters for the 2006 305(b) Report" memo states, "The biggest disadvantage [of probabilistic assessments] is that the specific location of water quality violations cannot be inferred from the sample. Therefore, the results of the probabilistic assessment must be used in concert with deterministic assessments of individual assessment units."

While the probabilistic assessment follows the criteria for probabilistic assessments in the CALM, it does not meet data quantity objectives to make individual assessment unit determinations. In specific, the 2008 CALM explicitly states,

“Probabilistic assessment results shall have no bearing on the Section 303(d) List other than the fact that samples collected for the probabilistic assessment can be combined with other samples within an assessment unit (AU) and assessed in accordance with this document (including the minimum sample size) to determine if the AU should be included on the Section 303(d) List.” (Section 3.1.27)

Further, the “Probabilistic Assessments of Estuarine Waters for the 2006 305(b) Report” memo states,

“The probabilistic assessments for aquatic life use support deviated from the requirements in the CALM in two ways. First sample size requirements for the indicators (e.g., 10 samples per assessment unit) were waived, since one visit was made to each station and the results from all the stations were aggregated”

In summary the above clearly indicate that data requirements and methodology for making probabilistic assessments are different than the data requirements and methodology specified in the 2008 CALM for making deterministic assessments for the 305(b) and 303(d) listings. Per the 2008 CALM, DES does not make a Not Supporting assessment based upon a single sample, particularly when the concentration is so close to the criteria. Further, when assessed “in concert” with the rest of the deterministic dataset, it is apparent that the one sample from the probabilistic survey collected in 2000 is not representative of the actual conditions in the Lower Piscataqua River.

### ***Lamprey River – Chlorophyll-a***

CLF’s comments cite “Probabilistic Assessments of Estuarine Waters for the 2006 305(b) Report” (Appendix 22 of the 2006, 305(b) Report) and states, “...probabilistic assessments of New Hampshire estuarine waters resulted in findings that ...high chlorophyll-a concentrations occurred in the Lamprey and Winnicut Rivers.”

Reviewing stations with high chlorophyll-a readings used in the Probabilistic Assessment memo revealed station NH05-0232A which lies in the Lamprey River (NHEST600030709-01).

After reanalyzing the full chlorophyll-a data set for the Lamprey River, the Assessment Unit (NHEST600030709-01) should have been assessed as Not Supporting Primary Contact Recreation due to chlorophyll-a in the 2008 assessment based upon the Magnitude of Exceedence criteria. That error will be corrected for the final 2008, 303(d) submission.

Number of Samples	110
Number of Exceedences (i.e. > 20 ppb)	3
Number of Magnitude of Exceedences (i.e. > 40 ppb)	2

	Critical Period (May 24-Sept 15)	Non-Critical Period (Sept 16 – May 23)	All Periods
Median	4.3	2.0	2.2
Average	9.5	2.9	6.2
Max	136.6	14.9	136.6

### ***Winnicut River – Chlorophyll-a***

CLF's comments cite "Probabilistic Assessments of Estuarine Waters for the 2006 305(b) Report" (Appendix 22 of the 2006, 305(b) Report) and states "...probabilistic assessments of New Hampshire estuarine waters resulted in findings that ...high chlorophyll-a concentrations occurred in the Lamprey and Winnicut Rivers."

With regards to the Winnicut River, all chlorophyll-a data was reviewed for the period January 1, 2002 to January 23, 2008 in accordance with the DES 2008 Consolidated Assessment and Listing Methodology (2008 CALM). Results indicated no chlorophyll-a data for the Winnicut River (NHEST600030904-01) for this time period. In reviewing the stations used in the "Probabilistic Assessments of Estuarine Waters for the 2006 305(b) Report" (Appendix 22 of the 2006, 305(b) Report) no stations were found in the mouth of the Winnicut River. Reviewing stations with high chlorophyll a readings used in the Probabilistic Assessment memo revealed station NH03-0220A which is near the mouth of the Winnicut River but is actually in the assessment unit for Pickering Brook (NHEST600030904-04-03). Pickering Brook is the next brook to the northeast of the Winnicut River as one travels counter-clockwise around Great Bay. A chlorophyll-a sample with a concentration of 24.7 was collected at NH03-0220A on 6/30/2003.

As indicated below, three chlorophyll a samples were collected in Pickering Brook for the period January 1, 2002 to January 23, 2008.

- Station NH03-0220A on 6/30/2003 had a concentration of 24.7 ppb
- Station NH03-0220A on 8/2/2005 had a concentration of 4.7 ppb
- Station NH06-0035A on 8/21/2006 had a concentration of 4.8 ppb

Based on the 2008 CALM, Pickering Brook was correctly assessed as Insufficient Information as DES does not make a Not Supporting assessment based upon a single sample, particularly when the concentration is so close to the criteria.



## B. SUMMARY OF SUBSTANTIVE DIFFERENCES BETWEEN THE DRAFT AND FINAL 2008 SECTION 303(D) LIST OF IMPAIRED SURFACE WATERS

TABLE 1: PARAMETER LEVEL SUBSTANTIVE CHANGES MADE TO ASSESSMENT UNITS (AUs)					
Assessment Unit ID	Assessment Unit Name	Use Description	Impairment Name	DES Category	Parameter Comments
NHEST600030406-01	Salmon Falls River	Primary Contact Recreation	Nitrogen (Total)	5-M	Added to be consistent with new methodology
NHEST600030904-02	Great Bay Prohib SZ1	Aquatic Life Use	Estuarine Bioassessments	5-T	Estuarine Bioassessments (i.e. Eelgrass decline)
NHEST600030904-03	Great Bay Prohib SZ2	Aquatic Life Use	Estuarine Bioassessments	5-T	Estuarine Bioassessments (i.e. Eelgrass decline)
NHEST600030904-04-02	Cromment Creek	Aquatic Life Use	Estuarine Bioassessments	5-T	Estuarine Bioassessments (i.e. Eelgrass decline)
NHEST600030904-04-03	Pickering Brook	Aquatic Life Use	Estuarine Bioassessments	5-T	Estuarine Bioassessments (i.e. Eelgrass decline)
NHEST600030904-04-04	Fabyan Point	Aquatic Life Use	Estuarine Bioassessments	5-T	Estuarine Bioassessments (i.e. Eelgrass decline)
NHEST600030904-04-05	Great Bay - Cond Appr	Aquatic Life Use	Estuarine Bioassessments	5-T	Estuarine Bioassessments (i.e. Eelgrass decline)
NHEST600030904-04-06	Adams Point South - Cond Appr	Aquatic Life Use	Estuarine Bioassessments	5-T	Estuarine Bioassessments (i.e. Eelgrass decline)
NHEST600030709-01	Lamprey River	Aquatic Life Use	Estuarine Bioassessments	5-P	Estuarine Bioassessments (i.e. Eelgrass decline)
NHEST600030709-01	Lamprey River	Primary Contact Recreation	Nitrogen (Total)	5-P	Added to be consistent with new methodology
NHEST600030709-01	Lamprey River	Primary Contact Recreation	Chlorophyll a	5-P	Added to be consistent with new methodology
NHEST600030806-01	Squamscott River	Aquatic Life Use	Estuarine Bioassessments	5-P	Estuarine Bioassessments (i.e. Eelgrass decline)
NHEST600030806-01	Squamscott River	Primary Contact Recreation	Nitrogen (Total)	5-P	Added to be consistent with new methodology
NHEST600030902-01-01	Oyster River (Johnson Cr)	Aquatic Life Use	Estuarine Bioassessments	5-P	Estuarine Bioassessments (i.e. Eelgrass decline)
NHEST600030902-01-02	Oyster River (Bunker Cr)	Aquatic Life Use	Estuarine Bioassessments	5-P	Estuarine Bioassessments (i.e. Eelgrass decline)
NHEST600030902-01-03	Oyster River	Aquatic Life Use	Estuarine Bioassessments	5-P	Estuarine Bioassessments (i.e. Eelgrass decline)
NHEST600030902-01-03	Oyster River	Primary Contact Recreation	Nitrogen (Total)	5-P	Added to be consistent with new methodology
NHEST600030904-06-17	Oyster River Mouth	Aquatic Life Use	Estuarine Bioassessments	5-P	Estuarine Bioassessments (i.e. Eelgrass decline)
NHEST600030903-01-01	Bellamy River North	Aquatic Life Use	Estuarine Bioassessments	5-P	Estuarine Bioassessments (i.e. Eelgrass decline)
NHEST600030903-01-02	Bellamy River South	Aquatic Life Use	Estuarine Bioassessments	5-P	Estuarine Bioassessments (i.e. Eelgrass decline)
NHEST600030904-01	Winnicut River	Aquatic Life Use	Estuarine Bioassessments	5-M	Estuarine Bioassessments (i.e. Eelgrass decline)
NHEST600030904-06-10	Adams Point Mooring Field SZ	Aquatic Life Use	Estuarine Bioassessments	5-P	Estuarine Bioassessments (i.e. Eelgrass decline)
NHEST600030904-06-11	Adams Point Trib	Aquatic Life Use	Estuarine Bioassessments	5-P	Estuarine Bioassessments (i.e. Eelgrass decline)
NHEST600030904-06-12	Upper Little Bay (South)	Aquatic Life Use	Estuarine Bioassessments	5-P	Estuarine Bioassessments (i.e. Eelgrass decline)
NHEST600030904-06-13	Lower Little Bay	Aquatic Life Use	Estuarine Bioassessments	5-P	Estuarine Bioassessments (i.e. Eelgrass decline)
NHEST600030904-06-14	Lower Little Bay Marina SZ	Aquatic Life Use	Estuarine Bioassessments	5-P	Estuarine Bioassessments (i.e. Eelgrass decline)
NHEST600030904-06-15	Lower Little Bay General Sullivan Bridge	Aquatic Life Use	Estuarine Bioassessments	5-P	Estuarine Bioassessments (i.e. Eelgrass decline)
NHEST600030904-06-16	Upper Little Bay (North)	Aquatic Life Use	Estuarine Bioassessments	5-P	Estuarine Bioassessments (i.e. Eelgrass decline)
NHEST600031001-01-01	Upper Piscataqua River-North	Aquatic Life Use	Estuarine Bioassessments	5-P	Estuarine Bioassessments (i.e. Eelgrass decline)
NHEST600031001-01-02	Dover WWTF SZ	Aquatic Life Use	Estuarine Bioassessments	5-P	Estuarine Bioassessments (i.e. Eelgrass decline)
NHEST600031001-01-03	Upper Piscataqua River-South	Aquatic Life Use	Estuarine Bioassessments	5-P	Estuarine Bioassessments (i.e. Eelgrass decline)
NHEST600031001-02	Lower Piscataqua River	Aquatic Life Use	Estuarine Bioassessments	5-P	Estuarine Bioassessments (i.e. Eelgrass decline)

**TABLE 2: SUBSTANTIVE CHANGES MADE TO THE  
CONSOLIDATED ASSESSMENT AND LISTING METHODOLOGY (CALM)**

The assessment methodology developed for eelgrass and described in “Methodology and Assessment Results related to Eelgrass in the Piscataqua River and Little Bay for Compliance with Water Quality Standards for the New Hampshire 2008 Section 303(d) List” is now part of the 2008 Consolidated Assessment and Listing Methodology.